



5. As a competitive business, and a financial institution, the Bank has a special need to protect its proprietary information, business practices, security practices, competitive information, and other trade secrets. The Bank is also obligated to protect the confidential information of its customers, including their personally identifiable information and their financial data.

6. The proposed protective order ensures that the Parties and subpoena respondents meet their discovery obligations, while providing appropriate, and necessary protection for their confidential documents and information. It contains procedures allowing the parties to modify certain of its restrictions if the need arises, and they agree to do so in writing. It also provides protections to ensure that the terms of the protective order are followed, and that any disagreements regarding the designation of a given document or information can be raised and resolved by the Parties, or, if needed, by the Court.

WHEREFORE, the Bank respectfully requests that this Court enter a Protective Order in the form attached hereto as Exhibit A.

Respectfully submitted,

UNITED CENTRAL BANK

Date: August 13, 2010

By: /s/Nada Djordjevic  
One of its Attorneys

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